DRAFT

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
BUREAU OF AIR MANAGEMENT
101 S. WEBSTER ST.
PO BOX 7921
MADISON, WI 53707

DRAFT

DRAFT REGISTRATION OPERATION PERMIT COMPLIANCE CERTIFICATION AND COMPLIANCE MONITORING REPORT

In order to comply with the requirements of chs. NR 438 and 439, Wisconsin Administrative Code*, all sources issued an air pollution control operation permit by the Wisconsin Department of Natural Resources must submit an annual certification of emissions, compliance with all permit terms and conditions and all applicable requirements over the reporting period specified in the permit, and a summary of monitoring. All certifications must be signed by a responsible official, as defined in NR 400.02(136), Wisconsin Administrative Code. Please retain records and all other material information used to certify compliance with your Air Pollution Control Registration Operation Permit for Department review.*

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name and	Name	
mailing address	Street or Route	
	City, State, Zip Code	

3. Facility Identification Number:	4. Registration Operation Permit Number: *RCP-A01*
5. Date of Permit Coverage:	6. Reporting Period - Beginning date: Ending date:

7. Describe any significant changes made to your facility during the previous 12 months

8. SIGNATURE OF RESPONSIBLE OFFICIAL

A. STATEMENT OF COMPLETENESS

□ I have reviewed this compliance certification and monitoring report in its entirety and, based on information and belief formed after reasonable inquiry, I certify that it contains all requirements contained in chs. NR 400-499 Wis., Adm. Code, applicable to this facility and that the statements and information in the document are true, accurate and complete.

B. CERTIFICATION OF FACILITY COMPLIANCE STATUS (check one box only)

□ During the entire reporting period identified in this compliance certification and monitoring report, I certify that this facility was in **continuous** compliance with **all** conditions specified in the permit and all other applicable requirements identified in this compliance certification.

□ During the entire reporting period identified in this compliance certification, I certify that this facility was in continuous compliance with **all** conditions specified in the permit and all other applicable requirements identified in this compliance certification, **EXCEPT** for the deviations identified on the enclosed deviation report. **NOTE: If you check this box, you must complete the attached Registration Operation Permit Deviation Summary Report, in which you list deviations from any conditions of the permit or applicable requirements for the reporting period covered by this compliance certification.**

Printed or Typed Name	Title
Signature	Date Signed

REGISTRATION OPERATION PERMIT COMPLIANCE CERTIFICATION

A1. CERTIFICATION OF EMISSION LIMITATIONS – EMISSION CAPS

POLLUTANT	a. EMISSION LIMIT	b. HOW IS COMPLIANCE DETERMINED	c. HOW IS COMPLIANCE DEMONSTRATED	d. COMPLIANCE STATUS
1. Particulate Matter Emissions	• 25 ton/year			In compliance? Yes☐ No☐
2. Volatile Organic Compounds	• 25 ton/year			In compliance? Yes☐ No☐
3. Nitrogen Oxides	• 25 ton/year			In compliance? Yes☐ No☐
4. Sulfur Dioxide	• 25 ton/year			In compliance? Yes☐ No☐
5. Carbon Monoxide	• 25 ton/year			In compliance? Yes☐ No☐
6. Lead	• 0.5 ton/year			In compliance? Yes☐ No☐
7. Section 112(b) Hazardous Air Pollutants (HAPs)	• 2.5 ton/year for each HAP • 6.25 ton/year total for all HAPs combined			In compliance? Yes☐ No☐

A.2. CERTIFICATION OF EMISSION LIMITATIONS – NR 424 CONTROL OF ORGANIC COMPOUNDS FROM PROCESS LINES

POLLUTANT	a. APPLICABLE LIMITATION	b. HOW IS COMPLIANCE DETERMINED	c. HOW IS COMPLIANCE DEMONSTRATED	d. COMPLIANCE STATUS
1. Organic Compound Emissions	**1.** We have a process line(s) that emits volatile organic compounds, which is not exempt per s. NR 424.03(1), Wis. Adm. Code, and is not an asphalt plant, so we apply the Department Approved LACT or latest available control techniques and operating practices demonstrating best current technology. [ss. NR 407.105(1)(c) and NR 424.03(2) and (3), Wis. Adm. Code.]	**1. DEPARTMENT APPROVED LACT** **(a)** We do not emit more than 10 tons of volatile organic compounds per year from each process line subject to LACT; **(b)** Because we are a spray coating operation, we also use one of the allowed spray coating technologies listed in the permit for each of our spray coating process lines subject to LACT. [ss. NR 407.105(1)(c) and NR 424.03(2)(c), Wis. Adm. Code.]	**1.** We material safety data sheets on hand that show the organic compound content of our coatings. **2.** We keep monthly records of the amount of coating and clean up solvent used on the process line. **3.** We have plans and specifications of our spray guns.	**a.1.** In compliance? Yes☐ No☐ Not applicable☐
	2. We have a process line(s) that emits volatile organic compounds, which is not exempt per s. NR 424.03(1), Wis. Adm. Code, so we control emissions by 85%. [ss. NR 407.105(1)(c) and NR 424.03(2), Wis. Adm. Code.]	**1.** We utilize a control device with 85% control or greater to control the volatile organic compounds emissions from the process line(s) subject to this requirement. [ss. NR 407.105(1)(c) and NR 424.03(2), Wis. Adm. Code.]	**1.** We monitor the control device parameters as required by the permit. **2.** We maintain the control device as required by the permit. **3.** We calibrate the control device monitoring instrumentation and meet the instrumentation accuracy as required by the permit.	**a.2.** In compliance? Yes☐ No☐ Not applicable☐
	3. We have a process line(s) that emits volatile organic compounds, which is not exempt per s. NR 424.03(1), Wis. Adm. Code, but meets the applicability criteria of a Reasonably Available Control Technology (RACT) standard, so we meet the RACT. [ss. NR 407.105(1)(c) and NR 424.03(2), Wis. Adm. Code.]	**1.** Insert methods for determining compliance here	**1.** Insert methods for demonstrating compliance here	**a.3.** In compliance? Yes☐ No☐ Not applicable☐
	4. We have a process line(s)	**1. DEPARTMENT APPROVED LACT FOR**	**1.** We kept records to demonstrate that	**a.4.** In compliance? Yes☐

POLLUTANT	a. APPLICABLE LIMITATION	b. HOW IS COMPLIANCE DETERMINED	c. HOW IS COMPLIANCE DEMONSTRATED	d. COMPLIANCE STATUS
	that emits volatile organic compounds, which is not exempt per s. NR 424.03(1), Wis. Adm. Code, and is an asphalt plant, so we apply the Department Approved LACT or latest available control techniques and operating practices demonstrating best current technology for asphalt plants. [ss. NR 407.105(1)(c) and NR 424.03(2) and (3), Wis. Adm. Code.]	**HOT MIX ASPHALT PLANTS** **(a)** For the previous year, within 30 days of the onset of hot mix production, and after that point, once within 20,000 tons of every additional 100,000 tons of hot mix production, we performed a burner check to determine the optimum levels of the following parameters: **(1)** Carbon monoxide (CO) and oxygen (O_2) levels in the drum, using a portable combustion analyzer, corresponding to burner operation in the most efficient manner, where the test port is located in the drum between the burner and the hot mix asphalt line, at the knock-out box, or in the duct-work after the drum; **(2)** Draft pressure levels at the front of the drum to assure the most efficient burner operation, measured by means of a pressure gauge (i.e., photohelic gauge) or other type of controller that controls a variable damper located in front of or behind the induced draft fan; **(3)** The following liquid fuel viscosity and gaseous fuel pressure and fuel feed conditions: **a.** Liquid fuel temperature for each liquid fuel; **b.** Pump pressure for each liquid fuel; and **c.** Gaseous fuel pressure. **(b)** The hot mix asphalt plant underwent a minimum of one burner check annually or a written waiver is obtained from the Department. **(c)** Weekly inspections were performed to ensure that the plant drum has tightly sealing drum end seals and duct work which keep air in-leakage to a minimum. **(d)** Optimum levels of the parameters in Condition E.3.a., of the permit were maintained. Records of the burner checks and weekly inspections required under Conditions E.3.b. and E.3.c., of the permit were kept. These records include the date of each action.	each of the actions required under the LACT were done.	No☐ Not applicable☐

A.3. CERTIFICATION OF EMISSION LIMITATIONS - OTHER APPLICABLE REQUIREMENTS IN NR 400 – NR 499 AND FEDERAL REQUIREMENTS IN THE CLEAN AIR ACT AND 40 CFR PARTS 50 TO 97

POLLUTANT	a. APPLICABLE LIMITATION	b. HOW IS COMPLIANCE DETERMINED	c. HOW IS COMPLIANCE DEMONSTRATED	d. COMPLIANCE STATUS
Add pollutant	Add limitation	Add compliance determination method	Add compliance demonstration method	Add compliance status

Add additional rows if necessary

A.4. CERTIFICATION OF EMISSION LIMITATIONS – PROHIBITED NSPS/MACT CHANGES

a. REQUIREMENT TYPE	b. APPLICABLE REQUIREMENT	c. COMPLIANCE STATUS
1. Prohibited Changes Related to MACT and NSPS:	**1.** We did not make any change that would cause our facility to be subject to any Maximum Achievable Control Technology (MACT) or New Source Performance Standard (NSPS) other than those listed in Section G. of the permit.	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐

B. CERTIFICATION OF COMPLIANCE DEMONSTRATION METHODS

a. METHOD	b. REQUIREMENT	c. COMPLIANCE STATUS
1. Pollution Control Device Operation, Monitoring and Maintenance	**1.** We have a source at our facility that uses a control device, so: **(a)** When it is necessary to use the control device to meet an emission limit in A.1. or any other emission limit, we operate the control device when the associated emission unit(s) are in operation. **(b)** We monitor the operation of the control device to ensure that it is operating properly. The parameters to be monitored and the frequency of monitoring are contained in Table 3. of Section F. of the permit. **(c)** We perform maintenance on the control device as recommended by the control device manufacturer, or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. [s. NR 407.105(1)(c), Wis. Adm. Code, and ss. 285.65(3) and (7), Wis. Stats.]	**b.1.(a)** In compliance? Yes☐ No☐ Not Applicable☐ **b.1.(b)** In compliance? Yes☐ no☐ Not Applicable☐ **b.1.(c)** In compliance? yes☐ no☐ Not Applicable☐
2. Accuracy of Pollution Control Device Monitoring Instrumentation	**1.** We monitor the operation of our air pollution control equipment, or monitor source performance, so the instrumentation we use to do so measures the operational variables with the following accuracy: **a.** The temperature monitoring device has an accuracy of 0.5% of the temperature being measured in degrees Fahrenheit or ± 5 °F of the temperature being measured, or the equivalent in degrees Celsius (centigrade), whichever is greater. **b.** The pressure drop monitoring device is accurate to within 5% of the pressure drop being measured or within ± 1 inch of water column, whichever is greater. **c.** The current, voltage, flow or pH monitoring device is accurate to within 5% of the specific variable being measured. [s. NR 439.055(3), Wis. Adm. Code]	**b.1.(a)** In compliance? yes☐ no☐ Not Applicable☐ **b.1.(b)** In compliance? yes☐ no☐ Not Applicable☐ **b.1.(c)** In compliance? yes☐ no☐ Not Applicable☐
3. Calibration of Pollution Control Device Monitoring Instrumentation	**1.** All instruments used for measuring source or air pollution control equipment operational variables are calibrated yearly or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. [s. NR 439.055(4), Wis. Adm. Code]	**b.1.** In compliance? yes☐ no☐ Not Applicable☐

a. METHOD	b. REQUIREMENT	c. COMPLIANCE STATUS
4.a. Stack Requirements: **Note:** If your facility demonstrates eligibility for this permit by meeting the stack parameter requirements in Condition B.4.a., then fill out this section. If your facility demonstrates eligibility for this permit by air quality modeling, then check "Not Applicable", and fill in 4.b., below, instead.	**1.** We demonstrated eligibility for this registration operation permit, in part, by meeting the stack criteria in s. NR 407.105(2)(a)2. and 3., Wis. Adm. Code, so: **(a)** The stack-vented emissions from the facility are exhausted from unobstructed discharge points that are within 10 degrees of vertical. This condition does not apply to stacks serving any of the emission units listed in s. NR 407.05(4)(c)9., Wis. Adm. Code. For purposes of this condition, horizontal discharge vents that only discharge general building ventilation are not considered stacks. **(b)** Each stack at the facility is taller than any building that influences the dispersion of emissions from the stack. A building is considered to influence the dispersion of emissions from any stack that exists within a circle around the building, the radius of which is 5 times the height of the building. This condition does not apply to stacks serving any of the emission units listed in s. NR 407.05(4)(c)9., Wis. Adm. Code. For the purposes of this condition, horizontal discharge vents that only discharge general building ventilation are not considered stacks. **(c)** We added or changed stacks after the date of coverage of our facility under this registration operation permit, so the stacks shall either meet the requirements of (a) or (b), above.	**b.1.(a)** In compliance? Yes☐ No☐ Not Applicable☐ **b.1.(b)** In compliance? Yes☐ No☐ Not Applicable☐ **b.1.(c)** In compliance? Yes☐ No☐ Not Applicable☐
4.b. Air Quality Modeling Requirements: **Note:** If your facility demonstrates eligibility for this permit by meeting the air quality modeling requirements in Condition B.4.b., then fill out this section. If your facility demonstrates eligibility for this permit by meeting the stack requirements, then check "Not Applicable" and fill out 4.a., above, instead.	**1.** We demonstrated eligibility for this registration operation permit, in part, by conducting an air dispersion modeling analysis as allowed in s. NR 407.105(2)(a)4. Wis. Adm. Code, so: **a.** We maintain a copy of the inputs and outputs for the most recent air dispersion modeling analysis; **b.** We did not change the stacks included in the air dispersion modeling analysis in such a way that would reduce the dispersion of the pollutants emitted from the stacks, OR demonstrated through an air dispersion modeling analysis that the change will not cause or exacerbate a violation of any air quality standard or increment. **c.** We added stacks after the date of coverage of our facility under this registration operation permit, or we made changes to existing stack(s) which would result in an increase in the ambient impact of the stack's emissions, so we demonstrated through an air dispersion modeling analysis that the change will not cause or exacerbate a violation of any particulate matter, PM-10, sulfur oxide, carbon monoxide, nitrogen oxide or lead air quality standard or increment. [ss. NR 407.105(2)(a)2. and 3., Wis. Adm. Code]	**b.1.(a)** In compliance? Yes☐ No☐ Not Applicable☐ **b.1.(b)** In compliance? Yes☐ No☐ Not Applicable☐ **b.1.(c)** In compliance? Yes☐ No☐ Not Applicable☐
5. Control Device Efficiency:	**1.** Each of the control devices at our facility meets the minimum control efficiency shown in Table 2. of Section F. of this permit at all times that the control device is operating. [s. NR 407.105(1)(c), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐

C. CERTIFICATION OF RECORDKEEPING REQUIREMENTS

a. RECORD	b. REQUIREMENT	c. COMPLIANCE STATUS
1. VOC and HAP Records:	**1.** By March 1 of each year, we calculate and record the amount of each VOC-containing or Section 112(b) HAP-containing material purchased or used (whichever is used as the basis for calculating emission) at the facility during the previous month. **2.** For each VOC- or HAP-containing material used at the facility, we maintain a record of the material safety data sheet (MSDS), or other equivalent document, which indicates the VOC and HAP contents of the material. [ss. NR 407.105(1)(c) and NR 439.04(1)(d), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐ **b.2.** In compliance? Yes☐ No☐ Not Applicable☐
2. Fuel Records:	**1.** We record the amount of fuel purchased or used (whichever was stated in the permit application) at the facility on a monthly basis. [ss. NR 407.105(1)(c) and NR 439.04(1)(d), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐
3. Hours of Operation Records:	**1.** We use the hours of operation of a source to calculate the emissions, so, by March 1 of each year, we calculate and record the hours operated for the source for the previous calendar year, rounded to the nearest hour.	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐
4. Material or Product Throughput Records:	**1.** We utilize the quantity of product produced by a source to calculate emissions from the source, so, by March 1 of each year, we record the monthly quantity of product produced for the process for the previous month. [ss. NR 407.105(1)(c) and NR 439.04(1)(d), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐
5. Facility Emission Records:	**1.** By March 1 of each year we calculate and record the total emissions of each pollutant contained in Table 1. of Section A. of the permit, emitted by our facility, for the previous calendar year. [ss. NR 407.105(1)(c) and NR 439.04(1)(d), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐
6. Air Pollution Control Device Monitoring Records:	**1.** We maintain records of the appropriate control device parameters listed in Section F. of this permit, at the specified frequencies. [ss. NR 407.105(1)(c) and NR 439.04(1)(d), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐
7. Air Pollution Control Device Operation Parameter Ranges:	**1.** We maintain records of the proper control device parameter ranges for each control device used at the facility. These ranges are based on manufacturer's recommendations or good engineering practice as established by operational history.[s. NR 407.105(1)(c) and NR 439.04(1)(d), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐
8. Stack Parameter Records:	**1.** For each stack at the facility, we keep and maintain on site technical drawings, blueprints or equivalent records that describer or illustrate the physical stack parameters. [ss. NR 407.105(1)(c) and NR 439.04(1)(d), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐
9. Air Dispersion Modeling Analysis Recordkeeping:	**1.** We demonstrated eligibility for this registration operation permit, or demonstrated that a change at the facility would not violate or exacerbate any air quality standard or increment, by performing an air dispersion modeling analysis, so we maintain records of the inputs and outputs of this analysis. [ss. NR 407.105(1)(c) and NR 439.04(1)(d), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐
10. Changes or Modifications at the Facility:	**1.** We kept records of any physical change to a stack or process at the facility that could result in an increase in emissions or an increase in the ambient impact of the emissions from the facility. These records contain a description of the change, the date the change was made(i.e., start date of construction or modification)	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐

a. RECORD	b. REQUIREMENT	c. COMPLIANCE STATUS
	and a statement indicating that, after the change, the facility will continue to qualify for this permit. [ss. NR 407.105(1)(c) and NR 439.04(1)(d), Wis. Adm. Code]	
11. Records Retention:	**1.** We keep all records required by this permit for at least five years, or the time period specified in the permit. [ss. NR 407.105(1)(c), NR 439.04(1)(d), and NR 439.04(2), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐

D. CERTIFICATION OF REPORTING AND NOTIFICATION REQUIREMENTS

a. REQUIREMENT TYPE	b. REQUIREMENT	c. COMPLIANCE STATUS
1. Change of Ownership of Control	**1.** Prior to a change in the ownership or control of our facility, we notified the Department of the change. This notification included a written agreement between the old and new owner which set forth a specific date for the transfer of permit responsibility, coverage and liability. [s. NR 407.105(1)(c), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐
2. Relocation	**1.** We relocated our facility and provided written notice to the Department providing the exact location where the facility will operate. [s. NR 407.105(1)(c) and (5)(a), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐
3. Emission Fees	**1.** In the previous year, we paid annual emission fees to the Department at the rate specified in s. 285.69(2), Wis. Stats. [ss. NR 410.04 and NR 407.09(1)(e), Wis. Adm. Code]	**b.1.** In compliance? Yes☐ No☐ Not Applicable☐

REGISTRATION OPERATION PERMIT SUMMARY OF MONITORING

REGISTRATION OPERATION PERMIT DEVIATION SUMMARY REPORT